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May 3, 2021

BY EMAIL & ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

RE: United States v. Michael Avenatti,
19 Cr. 374 (JMF)

Dear Judge Furman:

Enclosed please find a redacted version of Exhibit G to Michael Avenatti's omnibus pre-trial motion (Dkt. No. 115).

Although I do not understand the filing rules for CM/ECF in the Southern District of New York to always require the redaction of email addresses from public filings, I nevertheless intended to file a version of Exhibit G that did not have the complainant's email addresses visible to the public for privacy purposes. My redactions to Exhibit G did not appear to take hold in the first instance, however, and I subsequently sought the Court's leave to correct the error. Accordingly, with the Court's permission, I submit a redacted version of Exhibit G as an attachment to this letter.

Respectfully Submitted,



Robert M. Baum
Tamara Giwa
Andrew J. Dalack
Assistant Federal Defenders

Cc: Government Counsel

Counsel for Michael Avenatti